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PROPOSED ATTORNEYS FOR DEBTORS

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	Chapter 11
ERG Intermediate Holdings, LLC, et al., 1	§ §	Joint Administration Pending
Debtors.	§ §	Case No.:

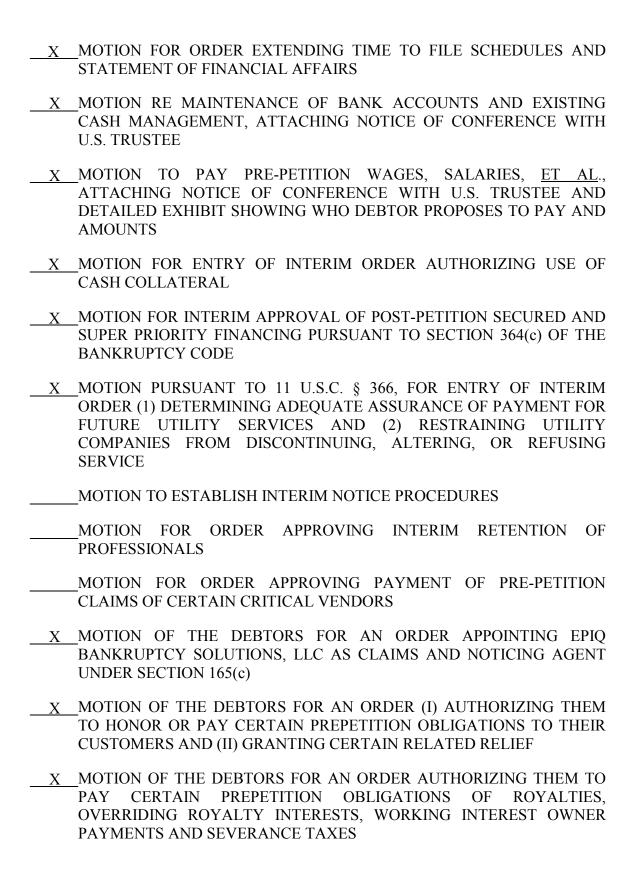
REQUEST FOR EMERGENCY CONSIDERATION OF <u>CERTAIN "FIRST DAY" MATTERS</u>

On April 30, 2015, ERG Intermediate Holdings, LLC.; ERG Resources, L.L.C.; West Cat Canyon, L.L.C.; ERG Interests, LLC; and ERG Operating Company, LLC (collectively, the "Debtors") each filed a petition for relief under Chapter 11 of the Bankruptcy Code. Counsel for the Debtors believes that these cases qualify as a "Complex Chapter 11 Case." The Debtors need emergency consideration of the following initial case matters (applicable items are checked):

X JOINT MOTION FOR JOINT ADMINISTRATION

CHI-181960885v6

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (7946). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.



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Dated: April 30, 2015

Dallas, Texas

Respectfully submitted,

/s/ Tom. A. Howley

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